

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED ____ March 25, 2008
	:	
ABU THOMAS	:	VIOLATIONS:
RICARDO WHITE	:	21 U.S.C. § 846 (conspiracy to possess
BRANDON WOODSON	:	with intent to distribute and distribution
	:	of cocaine base (“crack”) – 1 count)
	:	21 U.S.C. § 841(a)(1), (b)(1)(C)
	:	(possession with intent to distribute and
	:	distribution of cocaine base (“crack”)
	:	– 3 counts)
	:	21 U.S.C. § 860 (possession with intent to
	:	distribute and distribution of cocaine base
	:	(“crack”) within 1,000 feet of a school
	:	– 3 counts)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From on or about January 11, 2008 to on or about January 12, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ABU THOMAS,
RICARDO WHITE, and
BRANDON WOODSON**

conspired and agreed together to knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

MANNER AND MEANS

It was part of the conspiracy that:

1. Defendant RICARDO WHITE was the owner of a house located at 2425 West Firth Street in Philadelphia Pennsylvania.

_____ 2. Defendants ABU THOMAS, RICARDO WHITE, and BRANDON WOODSON sold packets of cocaine base (“crack”), a schedule II controlled substance, to individuals from inside the house located at 2425 West Firth Street in Philadelphia, Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants ABU THOMAS, RICARDO WHITE, and BRANDON WOODSON committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania:

1. On or about January 11, 2008, defendant BRANDON WOODSON, in the presence of defendant RICARDO WHITE, sold four packets of cocaine base (“crack”), a schedule II controlled substance, to a Philadelphia Police officer working in an undercover capacity (“the undercover police officer”) from a house located at 2425 West Firth Street in Philadelphia, Pennsylvania.

_____ 2. On or about January 12, 2008:

a. Defendant RICARDO WHITE told defendant ABU THOMAS to sell four packets of cocaine base (“crack”), a schedule II controlled substance, to the undercover police officer from inside the house located at 2425 West Firth Street in Philadelphia, Pennsylvania.

_____ b. Defendant ABU THOMAS sold four packets of cocaine base (“crack”), a schedule II controlled substance, to the undercover police officer from the house located at 2425 West Firth Street in Philadelphia Pennsylvania.

c. While inside the house located at 2425 West Firth Street in Philadelphia Pennsylvania, defendant BRANDON WOODSON, in the presence of RICARDO WHITE, possessed for distribution 37 packets of cocaine base (“crack”), a schedule II controlled substance.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 11, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ABU THOMAS,
RICARDO WHITE, and
BRANDON WOODSON**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 11, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ABU THOMAS,
RICARDO WHITE, and
BRANDON WOODSON**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising Fitzsimmons High School, a public high school, located at 2601 West Cumberland Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 12, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ABU THOMAS,
RICARDO WHITE, and
BRANDON WOODSON**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 12, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**ABU THOMAS,
RICARDO WHITE, and
BRANDON WOODSON**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising Fitzsimmons High School, a public high school, located at 2601 West Cumberland Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 12, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

BRANDON WOODSON

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 12, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

BRANDON WOODSON

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising Fitzsimmons High School, a public high school, located at 2601 West Cumberland Street in Philadelphia, Pennsylvania in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY